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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$879,643.00 IN
U.S. CURRENCY,

15 ASSORTED MONEY ORDERS VALUED
16 AT \$6,000.00 IN U.S. CURRENCY,

17 Defendants.

2:21-MC-00097-MCE-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

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19 It is hereby stipulated by and between the United States of America and potential claimants Maria
20 Gonzalez Sanchez and Jose Luis Mendoza Castillo (“claimants”), by and through their respective
21 counsel, as follows:

22 1. On or about January 3, 2021 and January 11, 2021, claimants filed claims in the
23 administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the
24 Approximately \$879,643.00 in U.S. Currency and Assorted Money Orders valued at \$6,000.00 in U.S.
25 Currency (hereafter collectively “defendant funds”), which were seized on or about October 1, 2020.

26 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
27 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a

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1 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has
2 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
5 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
6 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
7 That deadline was April 2, 2021.

8 4. By Stipulation and Order filed April 12, 2021, the parties stipulated to extend to July 1,
9 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

11 5. By Stipulation and Order filed July 21, 2021, the parties stipulated to extend to August 30,
12 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

14 6. By Stipulation and Order filed August 31, 2021, the parties stipulated to extend to
15 September 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
17 forfeiture.

18 7. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to
19 November 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 8. By Stipulation and Order filed December 6, 2021, the parties stipulated to extend to
23 January 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 9. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to March
27 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

1 10. By Stipulation and Order filed March 31, 2022, the parties stipulated to extend to May 27,
2 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

4 11. By Stipulation and Order filed May 27, 2022, the parties stipulated to extend to July 26,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

7 12. By Stipulation and Order filed July 28, 2022, the parties stipulated to extend to September
8 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10 13. By Stipulation and Order filed September 27, 2022, the parties stipulated to extend to
11 October 24, 2022, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
13 forfeiture.

14 14. By Stipulation and Order filed October 25, 2022, the parties stipulated to extend to
15 December 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
17 forfeiture.

18 15. By Stipulation and Order filed December 27, 2022, the parties stipulated to extend to
19 January 23, 2023, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 16. By Stipulation and Order filed January 25, 2023, the parties stipulated to extend to
23 February 22, 2023, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 17. By Stipulation and Order filed February 22, 2023, the parties stipulated to extend to
27 March 24, 2023, the time in which the United States is required to file a civil complaint for forfeiture

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1 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
2 forfeiture.

3 18. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
4 to May 23, 2023, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
6 forfeiture.

7 19. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
9 alleging that the defendant funds are subject to forfeiture shall be extended to May 23, 2023.

10 Dated: 3/22/2023

PHILLIP A. TALBERT
United States Attorney

11 By: /s/ Kevin C. Khasigian
12 KEVIN C. KHASIGIAN
13 Assistant U.S. Attorney

14 Dated: 3/22/2023

/s/ Kenneth Rosenfeld
KENNETH ROSENFELD
Attorney for potential claimant
Maria Gonzalez Sanchez


17 Dated: 3/22/2023

/s/ Allen N. Sawyer
ALLEN N. SAWYER
Attorney for potential claimant
Jose Luis Mendoza Castillo

(Signatures authorized by email)

21 **IT IS SO ORDERED.**

22 Dated: March 23, 2023

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24 MORRISON C. ENGLAND, JR.
25 SENIOR UNITED STATES DISTRICT JUDGE
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